Application No. 10/825,300 Reply to Office Action of July 28, 2006

REMARKS

Favorable reconsideration of this application, in view of the above amendments and following remarks, is respectfully requested.

Claims 1-20 are pending in this application. By this Amendment, Claims 10, 12, 17 and 19 are amended; and no claims are canceled or added herewith. It is respectfully submitted that no new matter is added by this Amendment.

In the outstanding Office Action the specification is objected to; Claims 7-13 and 17-20 were objected to for informalities; Claims 1-6 were rejected under 35 U.S.C. § 103(a) as unpatentable over U.S. Patent No. 6,799,011 B2 to <u>Abe</u> in view of U.S. Patent No. 6,801,742 B1 to <u>Mochimaru</u>; Claims 7-9 and 14-16 were rejected under 35 U.S.C. § 103(a) as unpatentable over U.S. Patent No. 6,233,427 B1 to <u>Hirota</u> in view of JP 2002-14555; and Claims 10-13 and 17-20 were indicated as including allowable subject matter.

With respect to the rejection of Claims 1-6 under 35 U.S.C. § 103(a) as unpatentable over <u>Abe</u> in view of <u>Mochimaru</u>, this rejection is respectfully traversed.

The applied art doe not teach or suggest that the conveyance unit includes a transfer device that transfers a visible image onto a transfer material, a fixing device that fixes the visible image transferred to the transfer material, and an upward conveyance part that conveys and ejects the transfer material to the internal eject part, with the transfer device, fixation device, and upward conveyance part incorporated into a single unit, as recited in Claim 1 and similarly recited in Claim 4.

Instead, <u>Abe</u> discloses, as best shown in Figure 1, an image forming unit 7 that includes image forming stations for forming multi-color images. Each image forming station has an image carrier 17 composed of a photosensitive drum, a charging means 19 composed of a corona charging means, and developing means 20 which are arranged around the image carrier 17. A thin toner layer is carried to the image carrier 17 so as to develop a latent image

on the image carrier. As shown in Figure 6, the first movable section 3 is opened from the housing body 2. A secondary transfer <u>roller</u> 39 is biased by means of a spring 64 so that the roller 39 can press against the transfer belt 14 and driving roller 12. As discussed in column 10, lines 51-64, only the movable section 3 as a cover of the apparatus, the rollers 37, transfer roller 39, sheet feeding passage 38 and fixing means 40 can be released from the front of the apparatus. Accordingly, there is no teaching, disclosure or suggestion for having a transfer device that transfers the visible image which is formed on an image carrier, onto the transfer material, along with a fixing device and upward conveyance part to be incorporated into a <u>single unit</u>, as recited in Claim 1 and similarly recited in Claim 4.

Mochimaru does not make up for the deficiencies of Abe discussed above, nor does the Office Action assert as such. Specifically, Mochimaru discloses as best shown in Figure 5 a stationary housing 1A and movable housing 1B. The movable housing 1B only contains the belt 15, and heating means 30A but does not contain elements such as a transfer device, fixing device and upward conveyance part formed that are formed into a single unit.

Accordingly, withdrawal of the rejection of claims under 35 U.S.C. § 103(a) as unpatentable over Abe in view of Mochimaru is respectfully requested.

With respect to the rejection of Claims 7-9 and 14-16 under 35 U.S.C. § 103(a) as unpatentable over <u>Hirota</u> in view of JP 2002-14555, this rejection is respectfully traversed.

Specifically, the applied art does not teach or suggest a front-side plate frame provided along a periphery of a front-side opening of an image forming part and has a protruding part extending upward along a side of the internal eject part and has an opening corresponding to an outer configuration of said conveyance unit wherein the front-side plate frame serves as a reinforcing member to reinforce a front side of the image forming apparatus, as recited in Claim 7 and similarly recited in Claim 14.

The Office Action acknowledges on page 4 that <u>Hirota</u> does not disclose a transfer device, fixing unit and conveyance rollers incorporated into a single unit removable from a front side of an image forming apparatus through an opening and a reinforcing frame member having a protruding part. However, the Office Action asserts that JP 2002-14555 discloses this feature. Applicants respectfully disagree. Specifically, the Office Action asserts that in Figures 2, 3, and 5 of JP 2002-14555, the removable unit is removable from a front frame member through an opening in the frame member. However, independent Claims 7 and 14 recite that the front-side <u>plate frame</u> is provided <u>along a periphery of a front-side opening</u> of the image forming part. This feature is not shown in the applied art. Again, JP 2002-14555 merely discloses an opening. However, there is no disclosure for a plate frame along a periphery of the opening nor does the Office Action direct Applicants' attention to this particular disclosure in the applied art. Accordingly, withdrawal of the rejection of the claims under 35 U.S.C. § 103(a) as unpatentable over <u>Hirota</u> in view of JP 2002-14555 is respectfully requested.

Consequently, for the reasons discussed in detail above, no further issues are believed to be outstanding in the present application, and the present application is believed to be in condition for formal allowance. Therefore, a Notice of Allowance is earnestly solicited.

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Should the Examiner deem that any further action is necessary to place this application in even better form for allowance, the Examiner is encouraged to contact the undersigned representative at the below listed telephone number.

Respectfully submitted,

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